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ADL customers to migrate only a portion of their numbers when they first take ADL service, the successful processing of this type of order is critical to AT&T's market entry.

44. AT&T submitted the partial migration order using the same "work around" approach to which BellSouth had agreed for EDI-6, and which had been processed successfully in testing with EDI-6. The May 14 order, however, was rejected by BellSouth's systems on May 15. Only on May 22 did AT&T learn -- for the first time -- that, as implemented by BellSouth, the EDI-7 interface could not accommodate the same work around as EDI-6. Although AT&T requested an immediate meeting with BellSouth to resolve the problem, BellSouth did not agree to meet for almost three weeks. When the parties met on June 9, BellSouth stated that AT&T could place orders for subsequent partial migrations on EDI-7 only by sending an order manually by fax, or by placing two related orders (a migration order and a change order). AT&T proposed several alternative ordering methods, but BellSouth refused to consider any of them. BellSouth also refused to extend the June 16, 1998 "sunset" date for EDI-6 unless AT&T agreed to pay BellSouth \$100,000 per month. Faced with the need to enter the market with an inbound calling offer, and because BellSouth's proposed two-order method is neither logical nor technically feasible,<sup>11</sup> AT&T was forced to agree to send orders for subsequent partial migrations by fax.<sup>12</sup>

45. However, because BellSouth does not allow the use of more than one field for an account number even in its manual (fax) ordering processes, AT&T needed written

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<sup>11</sup> See Bradbury Affidavit, Part II-C.

<sup>12</sup> Only during the first quarter of 1999, or perhaps even later, with the implementation of EDI-8 will AT&T have the ability to place these orders electronically on EDI.

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directions from BellSouth on how to send a manual subsequent migration order. Yet, although AT&T requested such documentation at the June 9 meeting, BellSouth did not provide such documentation until June 18. On June 19, 1998, AT&T prepared a sample order consistent with BellSouth's written requirements, and sent it to BellSouth for review and pre-approval to ensure that the order could be processed by BellSouth. On June 23, BellSouth told AT&T that three BellSouth subject matter experts had reviewed the order and concluded that it had been prepared properly. According to BellSouth it was "safe" for AT&T to place the order. Yet, when AT&T did so that same day, BellSouth rejected the order.

46. As of July 9, 1998, BellSouth had still not provided AT&T with clear rules and methods and procedures for the submission of orders for subsequent partial migrations by fax. AT&T's experience with orders for subsequent partial migrations has thus been a constant series of changes, obstacles, and problems posed by BellSouth. AT&T is now faced with entering the market with an ordering process that is inferior to the work around that BellSouth previously provided. BellSouth had not even disclosed to AT&T that it had eliminated the work around until AT&T was faced with the rejection of its test order -- just a few weeks before AT&T had scheduled the beginning of its implementation of 8YY and inbound local ADL service. As of the date of BellSouth's 271 application, AT&T was unable to place any orders for subsequent partial migrations successfully.

47. Even if BellSouth were able to accept manual orders, its inability to accept electronic orders for subsequent partial migrations with full electronic flow-through (or even on the work around basis previously available on EDI-6) substantially hinders AT&T's market entry,

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because it subjects AT&T's large business customers to a slower, more error-prone manual process. Given the inherent problems associated with manual processing, fax ordering (to the extent it can be done successfully) is likely to result in even greater provisioning problems -- and corresponding customer dissatisfaction -- than the earlier, and even then inadequate, work around process.

**2. Changes in RI-PH Provisioning**

48. BellSouth's unilateral change in the provisioning schedules for interim number portability using the Route Indexing - Portability Hub (RI-PH) method also threatens to make this method of interim number portability unavailable as a practical matter. AT&T and BellSouth have agreed to the use of RI-PH as an interim number portability solution. However, BellSouth unilaterally has changed its provisioning intervals in such a way that AT&T cannot make the necessary end-office arrangements to install RI-PH. Originally, BellSouth provided six-week provisioning intervals for RI-PH in selected end offices. BellSouth now states that such intervals may be insufficient because they were based on manual orders for a single central office at a time. As a result, AT&T does not know how long it will take to provision interim number portability using RI-PH in a central office or offices, except that it will probably take longer than six weeks. Unless AT&T knows the time that will be required to provision interim number portability, it cannot ensure that number portability will occur coincident with a cutover in service.<sup>13</sup> If the two fail to occur at the same time, AT&T will be unable to correctly provision

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<sup>13</sup> Moreover, although BellSouth has agreed to RI-PH, it has not agreed to full testing of that method. Thus far, BellSouth has agreed to conduct only "call through" testing, which tests only  
(continued...)

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our customer's inbound service. Moreover, AT&T normally would expect to be able to turn up a customer's inbound ADL service within 30 days. If BellSouth takes six weeks or more to implement RI-PH in its switches, AT&T's ability to offer a competitive local exchange service in the marketplace will be jeopardized.

**3. Porting of DID Numbers**

49. AT&T's introduction of ADL service also has been impaired by BellSouth's insistence on unnecessary and non-cost-based charges for porting of DID numbers. Such charges violate not only the Act's requirement that BellSouth provide number portability in accordance with the Commission's orders, but also its requirement that charges for number portability be cost-based and applied in such a manner that they do not forestall incipient competition.

50. Before carriers other than BellSouth were able to offer local exchange service, porting of telephone numbers was unnecessary, because any and all DID numbers installed at a customer's location in the BellSouth serving area were routed for termination only to a BellSouth switch. However, to provide ADL service, AT&T will need to port certain of the DID numbers installed at the BellSouth serving switch to an AT&T switch. Although BellSouth's General Subscriber Service Tariff states that it is BellSouth's policy to arrange DID numbers in blocks of 20 consecutive numbers, many ADL customers need less than a full 20-number block.

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<sup>13</sup> (...continued)

whether calls are forwarded properly; it does not confirm features conflicts or billing issues. Tests on billing conflicts and reciprocal compensation have not been conducted because BellSouth has been unwilling to confirm which call flow details it will record and provide to AT&T.

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In such circumstances, porting the full block would unnecessarily increase the cost to DID customers and force them to use numbers they do not require.

51. In response to AT&T's request to port less than a full 20-number block, BellSouth has stated that it will do so only in return for payment of certain "special assembly" charges, which include a non-recurring "contract preparation" charge and a monthly recurring charge. In Florida, for example, BellSouth quoted a contract preparation charge of \$630.00, an additional non-recurring charge of \$2.20, and a monthly recurring charge of \$.20 for each remaining DID number (i.e., the non-ported numbers). Because the porting of fewer than 20 DID numbers requires only minor software work, there is no technical reason or cost basis that would justify these charges.<sup>14</sup>

52. Such non-cost-based charges violate the Commission's clear rulings that interim number portability charges must be based on incremental cost. *Telephone Number Portability*, CC Docket No. 95-116, RM 8535, First Report and Order and Further Notice of

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<sup>14</sup> The non-cost basis for these charges is evidenced by the fact that they are subject to negotiation and are not uniform among the BellSouth states. For example, in Georgia the contract preparation charge is \$336.00. Although BellSouth had originally quoted a higher contract preparation charge for Georgia, it reduced the level to \$336.00 after discussions with AT&T. When AT&T requested a similar reduction for Florida, BellSouth declined, asserting that the earlier reduction in Georgia had been a "mistake." AT&T has now filed a complaint before the Florida Public Service Commission challenging the "special assembly" charges. See Petition of AT&T of the Southern States, Inc. for Modification of BellSouth Telecommunications, Inc.'s policies regarding the porting of Direct-In-Dial Numbers, Docket No. 980770-TP (Fla. PSC), filed June 19, 1998. Pending a ruling by the Florida PSC, AT&T has agreed to pay the charges under protest.

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Proposed Rulemaking, FCC 96-286 (rel. Jul. 2, 1996), ¶ 129.<sup>15</sup> Moreover, the incremental payment made by the CLEC for interim number portability “cannot put the new entrant at an appreciable cost disadvantage” to other CLECs or the incumbent LEC. *Id.*, ¶¶ 132-33.

53. The fact that BellSouth has failed to base these interim number portability charges on incremental cost is bad enough, but BellSouth compounds the anticompetitive effect of these charges by interjecting itself into the relationship between CLECs and their potential customers. Although the special assembly charges have been billed to AT&T during ADL testing, BellSouth has stated that such charges will be billed directly to ADL customers when service is introduced into the market. The prospect of being required to pay these charges will only serve to discourage prospective ADL customers from switching local carriers and taking ADL service. Moreover, BellSouth insists that the prospective ADL customer sign an agreement directly with BellSouth to be responsible for such charges before BellSouth will even accept the order from AT&T. This injection of BellSouth’s presence directly into AT&T’s marketing efforts will clearly have an additional chilling effect on AT&T’s efforts to persuade businesses to take ADL service.

**4. Inability To Accept Disconnect Orders**

54. In AT&T’s provision of ADL service, some customers will eventually request that their lines served by ported numbers be disconnected because they are moving to another location or for some other reason. Such disconnections are commonplace in any local

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<sup>15</sup> Section 251(e)(2) of the Act unambiguously grants the Commission the power to determine how number portability costs will be assessed and allocated, and this Commission authority has been acknowledged by the Eighth Circuit. *Iowa Utilities Board v. FCC*, 120 F.3d 753, 794 & n.10 (8th Cir. 1997), *cert. granted*, \_\_\_ U.S. \_\_\_, 118 S.Ct. 879 (1998) (noting that Congress expressly called for the Commission to establish rules in connection with § 251(e)).

service carrier's operations, and BOCs such as BellSouth have procedures in place for processing disconnect requests from their retail customers. Thus, it is important that a CLEC be able to ensure that a customer's request for disconnection will be honored.

55. BellSouth, however, has neither established nor promulgated requirements for CLEC submission of orders, whether electronic or manual, to disconnect ported numbers. As a result, AT&T has no way of submitting such disconnect orders. Thus, if an ADL customer seeks to discontinue ADL service, for example, if it moves from its current location, the ported numbers will not be disconnected. Moreover, because AT&T's systems do not discontinue customer billing until a completion notice is received from BellSouth, billing of the customer is likely to continue (erroneously). This inability is likely to cause not only customer dissatisfaction, but also further loss of business from the customer if the customer takes ADL service in other locations around the country.

**5. Lack of Testing for Ordering Permanent Number Portability**

56. The Commission's orders require that in Georgia, all new customers in the Atlanta MSA must be served by LRN no later than August 31, 1998.<sup>16</sup> The successful implementation of LRN requires that an electronic interface be in place to issue orders for the

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<sup>16</sup> BellSouth sought and received from the Commission a waiver of its obligation to implement Phase I number portability based on the change in the number portability vendor for the Southeast Region. *Telephone Number Portability*, CC Docket No. 95-116, Order, DA 98-164 (rel. Mar. 31, 1998). However, as AT&T pointed out in its comments on BellSouth's waiver request, the vendor change should not have necessitated the seven and one-half month delay requested by BellSouth, nor the five month delay granted by the Commission. See *Telephone Number Portability*, CC Docket No. 95-116, Comments of AT&T Corp., filed March 12, 1998, Attachment 6 to this affidavit. In any event, the vendor change should have absolutely no impact on BellSouth's implementation of an electronic ordering interface.

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porting of numbers, and that CLECs be afforded ample opportunity for testing of the electronic interface to determine whether such orders will be processed accurately and effectively.

BellSouth, however, does not intend to allow CLECs any opportunity to test the LRN electronic ordering interface before it is "live" and required for customer orders (*i.e.*, before August 31, 1998).

57. AT&T advised BellSouth in April 1998 that it was ready to test the EDI interface for LRN ordering. BellSouth initially agreed to make LRN ordering capability available for testing on April 16, 1998. However, BellSouth subsequently advised AT&T that AT&T would not be able to submit any EDI test orders for LRN until August 31, 1998 -- the day on which LRN is required to be implemented in the Atlanta MSA. Thus, there will be no prior opportunity for AT&T to test the EDI interface to determine whether it can process LRN orders. By contrast, BellSouth will begin taking manual test LRN orders beginning on August 15, two weeks before the cutover to LRN. In order to ensure that its customers are not affected by a faulty ordering interface, AT&T must rely on manual LRN orders (because they are the only ones AT&T can test in advance) until it can determine through testing whether the EDI interface can successfully process orders for LRN -- a process that would take at least 30 days even under optimum conditions. AT&T is likely to submit LRN orders manually for an even longer period if the testing results are unsatisfactory or if the LRN ordering functionality is not available on EDI on August 31, as scheduled.

58. The need to submit LRN orders manually threatens AT&T's ability to compete in the market. Customer satisfaction depends on transparent porting of the customer's



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number. Because BellSouth is providing no opportunity for prior testing of the LRN ordering functionality on EDI, AT&T will be compelled to use a manual process that creates significant risk of delay and error.

**C. Failure to Provide Directory Listings**

59. Checklist item (viii), section 271(c)(2), requires that BellSouth provide White Pages directory listings for CLEC customers. This obligation extends to both residential and business customers, and requires BellSouth to provide such listings in a nondiscriminatory manner. In determining whether BellSouth complies with this checklist requirement, the Commission should require that BellSouth: (1) provide listings for CLEC customers identical to, and fully integrated with, BellSouth customer listings; (2) provide listings for CLECs with the same accuracy and reliability that it provides to its own customers; (3) have procedures in place to ensure that CLEC listings are comparable in accuracy and reliability to BellSouth customer listings.

60. BellSouth's attempted provision of directory listings fails all these tests. BellSouth had no processes in place at all at the time of its 271 application to accept orders for key types of directory listings, *i.e.*, complex directory listings for ported numbers. In addition, because of BellSouth's failure to adhere to its own specifications, at the time of BellSouth's application, those directory listing orders for AT&T-assigned numbers that BellSouth could accept had to be submitted on a manual basis. Finally, as of July 9, 1998, BellSouth was unable to accept at all directory listing orders associated with partial subsequent migrations of ported numbers.

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**1. Complex Directory Listings**

61. AT&T's experience with complex directory listings for ported numbers demonstrates graphically how BellSouth's failure to provide adequate documentation and to develop and follow adequate change control procedures has prevented CLECs from even being able to submit orders for these commercially important listings. In early July, without advising AT&T in advance, BellSouth changed its preexisting requirements for the ordering of complex directory listings for ported numbers, resulting in rejection of AT&T orders and leaving AT&T unable to order such listings.

62. Large businesses, such as department stores, may desire that their directory listing include not only a main listed number but also the direct numbers of various branches or offices within the company. For example, a store such as Macy's may desire that the direct numbers for each of its departments appear underneath its main listed number in the directory. Such "complex directory listings" are likely to be commonplace among ADL customers.

63. Existing BellSouth customers with complex directory listings are likely to wish to retain those listings if they take ADL service. It therefore is essential that BellSouth have a method in place for associating complex directory listings orders with the ported telephone number order, and that the order be completed. Until early July, AT&T and BellSouth had a mutually agreeable process in place that worked. AT&T sent orders with duplicate purchase order numbers ("PONs"), which consist of 16 numeric characters. The first order indicated the telephone number that needed to be ported; the second order utilized the same PON, followed by the letters "ACS," which indicated that the number was tied to a DID number block -- and thus

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was part of a complex directory listing. This procedure worked successfully throughout AT&T's trial of the EDI-6 interface and through the introduction of EDI-7.

64. In early July, however, BellSouth's systems abruptly, and without warning, began rejecting such complex directory listings orders. As Mr. Bradbury states in his affidavit, in response to AT&T's inquiries BellSouth stated that it had implemented a new internal system that recognizes only the first 16 numeric characters of the PON, and therefore no longer recognizes the additional alpha characters. For this reason, the new internal system fails to recognize the linkage of the orders -- the second order received (either the directory listing order or the ported number order) therefore is considered a duplicate order and rejected. As a result, AT&T could place orders only for "simple"/main directory listings on ported telephone numbers.

65. BellSouth provided no notice of this change to AT&T before it was implemented. On behalf of AT&T, I protested to BellSouth that the change in procedures made it impossible for AT&T to place orders (even a manual order) for any customer that requires a complex directory listing on ported telephone numbers, and that, given the importance of such listings to ADL customers, AT&T's marketing efforts would be virtually "dead in the water." When I communicated this fact to BellSouth, BellSouth simply replied, "So noted." As of the date of its application, BellSouth had provided no method for AT&T to place such complex directory listing orders.

**2. Miscellaneous Account Numbers**

66. BellSouth also is unable to accept directory listing orders associated with valid telephone numbers assigned to AT&T as reflected in the LERG ("LERG-assigned

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numbers").<sup>17</sup> AT&T uses LERG-assigned numbers when a customer chooses to implement ADL with new phone numbers rather than its pre-existing ones. AT&T is assigned such numbers (as NPA-NXXs) by the telephone number administrator, currently BellSouth. Because AT&T then assigns such numbers directly to its customers, it does not need number portability from BellSouth, but does require NPA/NXX activation, as well as the ability to obtain directory listings for such numbers. Because BellSouth cannot recognize and accept as AT&T's account number the AT&T-assigned telephone number, it refuses to process AT&T directory listing orders unless AT&T uses BellSouth-assigned Miscellaneous Account Numbers<sup>18</sup> on its orders. As Mr. Bradbury explains more fully in his affidavit, this requirement has substantially, and unnecessarily, increased AT&T's costs. More importantly, BellSouth's systems are not even prepared currently to accept Miscellaneous Account Numbers when sent by AT&T in an initial order.

67. BellSouth's insistence on the use of Miscellaneous Account Numbers requires that AT&T reference the Miscellaneous Account Number on all directory listing orders for a particular account. Under the process initially required by BellSouth, BellSouth would include a Miscellaneous Account Number with the firm order confirmation for the initial order.

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<sup>17</sup> AT&T will assign numbers from the LERG when such assignment is required by a customer's particular needs. A customer, for example, may desire a specific block of numbers, or request that each of its stores have the same last four digits in its telephone number in every area where it does business. Those needs could likely be satisfied only through assignment of numbers from the LERG.

<sup>18</sup> A Miscellaneous Account Number includes an alpha character as the fourth character of the number (for example, XXX-MXX-XXXX, where "X" denotes a numeric character).

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Thereafter, BellSouth required that AT&T use that Miscellaneous Account Number on any subsequent directory listing order for that account. If AT&T failed to do so, BellSouth would set up separate accounts for the same customer -- resulting in separate directory listings for the same customer. In order to keep track of the Miscellaneous Account Number, AT&T representatives would have to enter the number manually into AT&T's internal systems.

68. Because BellSouth refused to modify its system to accept valid AT&T telephone numbers, and in order to avoid the problem of manual entry, AT&T proposed that it obtain from BellSouth a block of 10,000 Miscellaneous Account Numbers, which AT&T would then be free to include in its orders to BellSouth. BellSouth agreed to this process. AT&T therefore developed a separate database for the purpose of maintaining Miscellaneous Account Number data and handling two numbers (the Miscellaneous Account Number and the LERG-assigned number) for the same customer. However, BellSouth thereafter advised AT&T that it could not accept orders with Miscellaneous Account Numbers because it had not defined the process for its internal systems to accept Miscellaneous Account Numbers after they have been submitted by AT&T. According to BellSouth, this process will not be completed until August 1, 1998, at the earliest. In other words, BellSouth's systems cannot currently accept AT&T LERG-assigned numbers or Miscellaneous Account Numbers when sent by AT&T in an initial order.

69. Until the current situation is resolved, AT&T must continue to use the more time consuming and inefficient method originally proposed by BellSouth, i.e., AT&T must wait until BellSouth sends back a Miscellaneous Account Number with the Firm Order Confirmation and manually input that number into AT&T's database. Because this is a manual

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process, it is fraught with potential error and possible customer dissatisfaction due to incorrect directory listings. BellSouth's practices are both unreasonable and discriminatory, given the fact that BellSouth is not required to use Miscellaneous Account Numbers in its retail operations.

70. Finally, BellSouth has contended to AT&T that this problem will be resolved with the introduction of permanent number portability. However, under the Commission's orders, LRN will be implemented only in certain MSAs in the BellSouth region. Currently, permanent number portability is scheduled to be implemented in Louisiana on October 31, 1998 in the New Orleans MSA, and on December 31, 1998 in the Baton Rouge MSA. Under the Commission's orders, BellSouth need not implement permanent number portability in other parts of the state until 1999, and even then BellSouth can take up to six months to do so per switch after receiving a CLEC request. Consequently, even if BellSouth is correct, LRN will provide only a partial solution at best for the foreseeable future.

**CONCLUSION**

71. The problems that I have described have erected serious obstacles to AT&T's attempt to provide ADL service in the BellSouth region. To take but a few examples, AT&T cannot compete effectively when it cannot obtain required interconnection trunks, when it cannot have its customers' calls properly routed by BellSouth's switches, when it cannot even order number portability for partial subsequent migrations, when it cannot offer its business customers the directory listings they desire, or when ADL customers must pay unnecessary and excessive charges when they desire fewer than 20 numbers. BellSouth encounters none of these

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problems in its own retail operations. With all of the roadblocks BellSouth has erected to the provision of competitive local service, it cannot reasonably claim to be providing nondiscriminatory interconnection, number portability and directory listings as required by the Act.


\\ODMA\PCDOCS\WASHINGTON\79207\1 July 31, 1998 (6:08pm)



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I declare under penalty of perjury that the foregoing is true and correct.  
Executed on July 22, 1998.

  
Donna L. Hassebrock

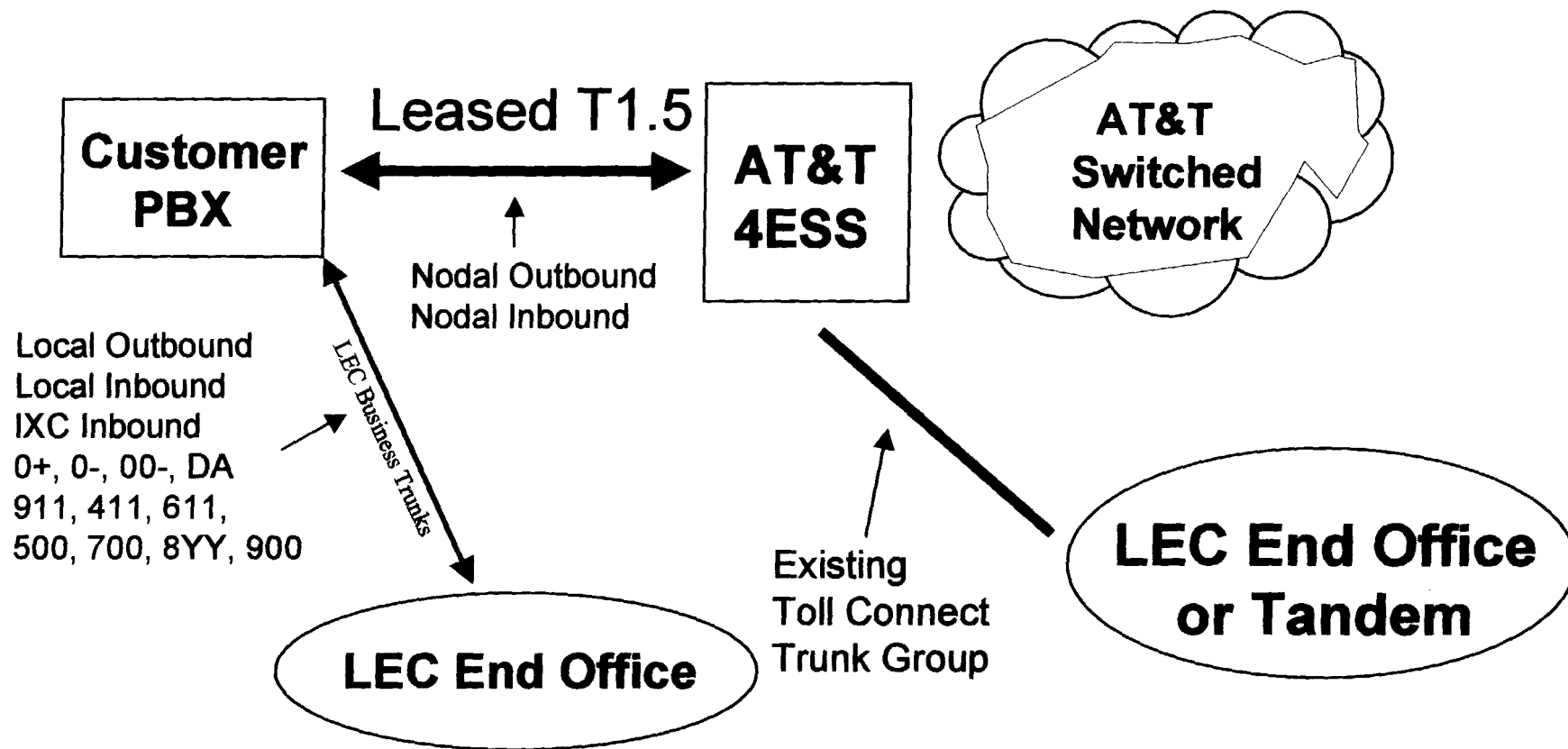
Sworn to and subscribed to before me

this 22<sup>nd</sup> day of July, 1998

  
Notary Public    Notary Public Gwinnett County, Georgia  
My Commission Expires March 14th, 1999

# ATTACHMENT 1

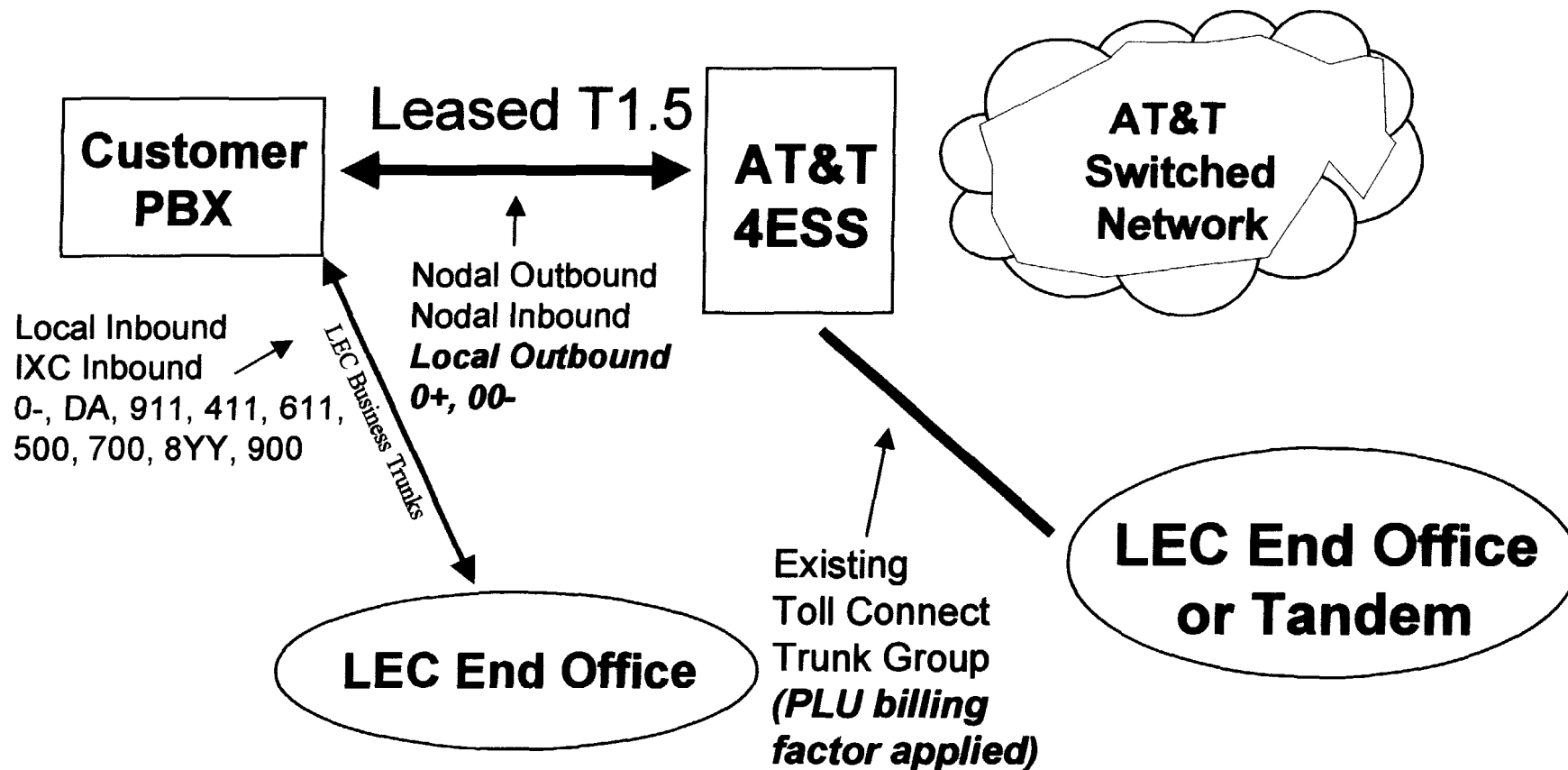
# 4E Local Architecture - Existing Long Distance Nodal Services



# AT&T Digital Link Architecture

## Outbound Local Capability

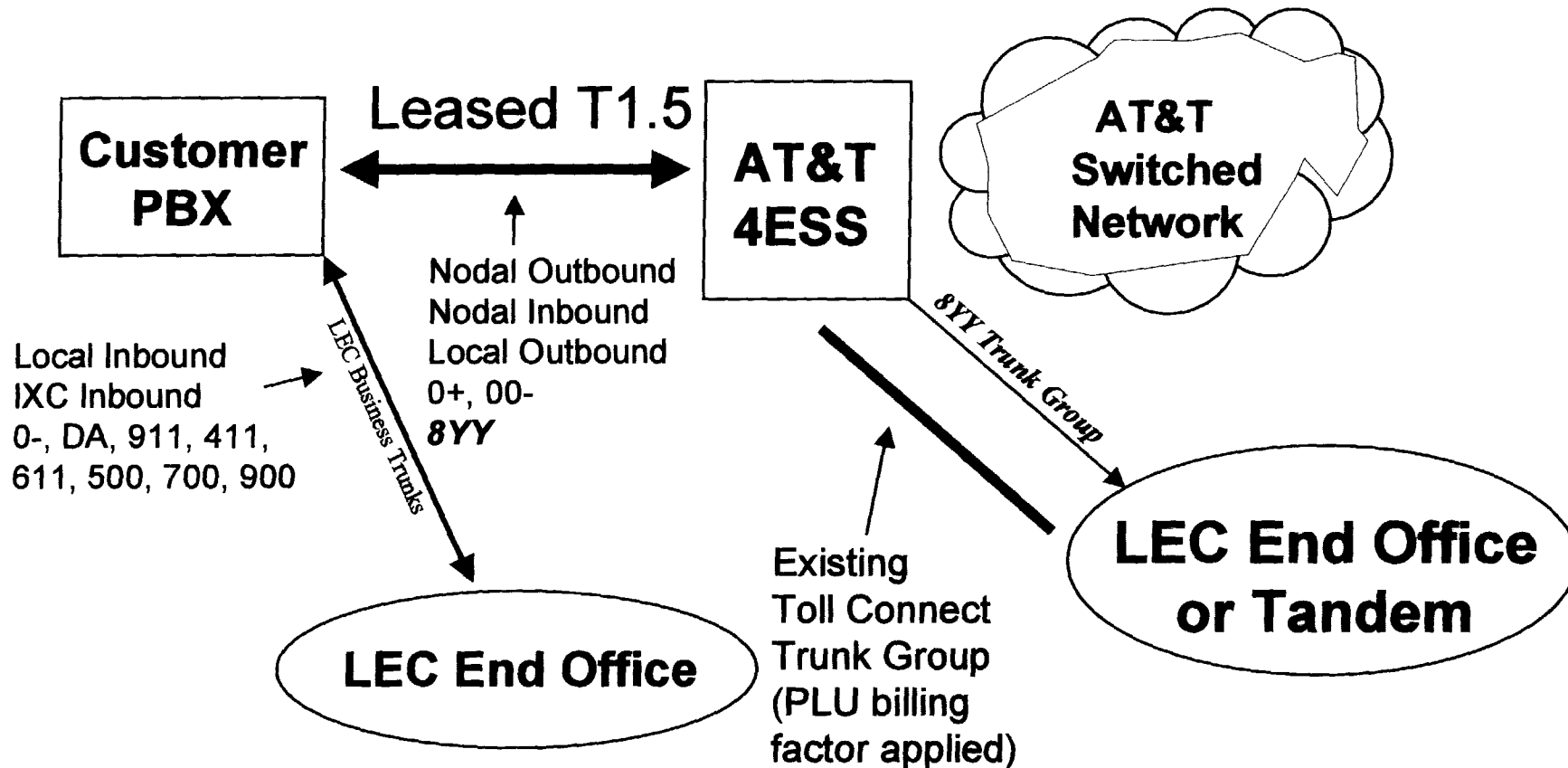
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# AT&T Digital Link Architecture

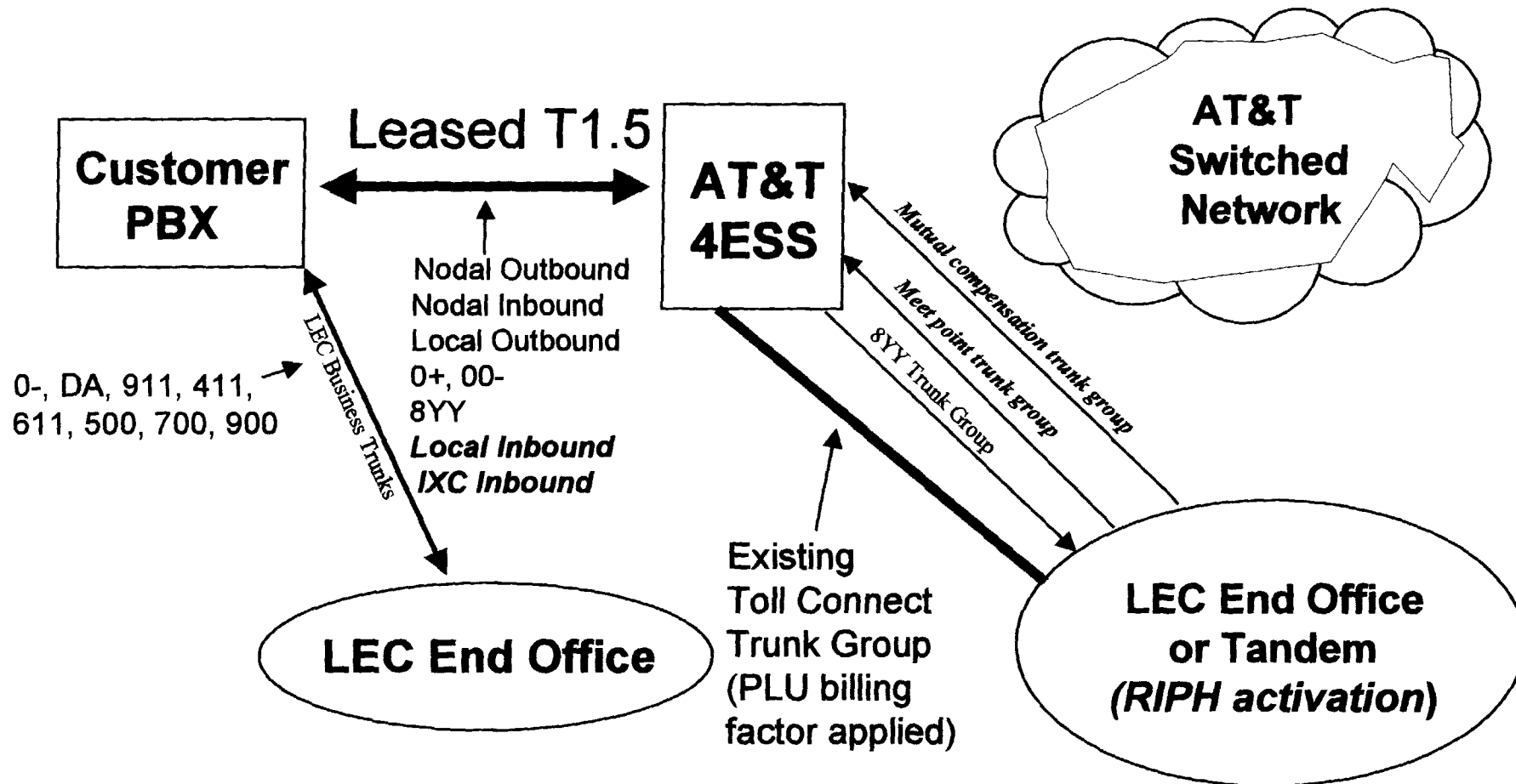
## 8YY Capability

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# AT&T Digital Link Architecture

## Inbound Local Capability



# **ATTACHMENT 2**

FAX TO: DEBRA STOCKTON

*770-621-0629*

FROM: PAM NELSON  
404 810-3100

PLEASE NOTIFY

DEBRA STOCKTON

ON 770 492 7555

OF RECEIPT THIS FAX



June 4, 1998

To: Debra Stockton  
BellSouth Account Team

From: Pam Nelson  
AT&T 

Debra,

In reply to your voice mail this evening, I will both fax the list to you and leave the list on your voice mail. Since the problems were reported earlier in the week, I'm frankly surprised that the BellSouth team has not resolved the trouble reported. Our ADL Testing Execution Center (TEC) reported the problems to BellSouth on 6/1 & 6/2. I can get Terry Jackson-ADL TEC Supervisor, to provide the name(s) of the BellSouth Network Management Center contact that we gave the discrepancies, if that piece of information will help in some way.

As of today at 3:00 p.m., the problems reported to the BellSouth Network Management Center are still open. It is my understanding that the BellSouth NMC has complete trouble report detail. The NPA NXXs reported (with defects of a vacant code announcement and/or traffic coming to the AT&T network over the wrong trunk group) are as follows: (This list may not contain all of the NPA NXXs reported on 6/1 or 6/2.)

|         |         |
|---------|---------|
| 706-286 | 770-904 |
| 770-288 | 770-905 |
| 770-296 | 770-906 |
| 770-570 | 770-910 |
| 770-651 | 770-940 |
| 770-657 | 770-970 |
| 770-658 | 770-990 |
| 770-659 | 404-838 |
| 770-765 | 912-321 |
| 770-790 | 912-373 |
| 770-880 | 404-461 |
| 770-885 | 706-220 |
| 770-895 | 706-225 |
| 770-899 | 404-348 |

There is good news, there were three NPA NXXx (404-704, 404-914, 770-896) that tested successfully and passed validation last weekend.

Any assistance you can provide to help resolve the problems and resolution/repair cycle time will be appreciated.